

STATEMENT OF BASIS (AI No. 3479)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0107352 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Bilco Tools, Inc.
Post Office Box 9064
Houma, Louisiana 70361

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: December 5, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - N/A
NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permit - LA0107352
LPDES permit effective date: December 1, 2000
LPDES permit expiration date: November 30, 2005

D. Date Application Received: August 28, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - oilfield service company

Bilco Tools, Inc. is an existing oilfield service company that services and repairs oilfield equipment.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 1389

C. LOCATION - 107 Clendenning Road, Houma, Terrebonne Parish
(Latitude 29°35'5", Longitude 90°39'59")

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: equipment washwater and stormwater runoff
Treatment: oil/water separator
Location: at the point of discharge from the oil/water separator
located on the northwest side of the facility
(Latitude 29°35'5", Longitude 90°39'59")
Flow: 500 gpd
Discharge Route: unnamed ditch thence to Bayou Terrebonne

Outfalls 002 and 003

These outfalls were previous stormwater outfalls. These outfalls are being removed from the permit based on a review of DMR's that indicated there were no excursions for the outfalls for the last two years. Stormwater will now be addressed in the Stormwater Pollution Prevention Plan (SWP3) language in this permit.

4. RECEIVING WATERS

STREAM - unnamed ditch thence to Bayou Terrebonne

BASIN AND SEGMENT - Terrebonne Basin, Segment 120601

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit:

1. Outfalls 002 and 003 have been removed from the permit. See Outfall Information.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

The most current inspection of the facility was conducted on September 29, 2006 as a result of Hurricane Katrina and Hurricane Rita. The assessment stated there was no environmental impact or damage reported by the facility as a result of these hurricanes.

B. DMR Review/Excursions

A DMR review was conducted for the last two years. All DMR's were reported in accordance with the current permit and no excursions were noted.

7. EXISTING EFFLUENT LIMITS

Outfalls 001 - wash wastewater and stormwater runoff

| Parameter | LPDES | |
|----------------------|---------------------------------------|-----------------------------|
| | Monthly Average | Daily Maximum |
| Flow - gpd | Report 1/3 mos Est. | Report 1/3 mos Est. |
| COD | --- | 125 mg/L 1/3 mos Grab |
| Oil & Grease | --- | 15 mg/L 1/3 mos Grab |
| TSS | --- | 45 mg/L 1/3 mos Grab |
| Soaps and Detergents | Report 1/3 mos Inv. Calculation | --- |
| pH | 6.0 - 9.0 s.u. 1/3 mos Grab | |

Outfalls 002 and 003 - stormwater runoff

| Parameter | LPDES | |
|--------------|-----------------------------------|----------------------------|
| | Monthly Average | Daily Maximum |
| Flow - gpd | Report 1/3 mos Est. | Report 1/3 mos Est. |
| TOC | --- | 50 mg/L 1/3 mos Grab |
| Oil & Grease | --- | 15 mg/L 1/3 mos Grab |
| pH | 6.0 - 9.0 s.u. 1/6 mos Grab | |

8. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 120601 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006, from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Bilco Tools, Inc.

1. **Outfall 001 - equipment washwater and stormwater runoff** (estimated flow is 500 gpd)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max (mg/l) | <u>Reference</u> |
|--------------------|--|-----------------------|
| Flow | Report:Report | LAG480000, Schedule B |
| COD | ---:125 mg/L | LAG480000, Schedule B |
| Oil & Grease | ---:15 mg/L | LAG480000, Schedule B |
| TSS | ---:45 mg/L | LAG480000, Schedule B |
| Soaps & Detergents | Report:--- | LAG480000, Schedule B |
| pH | 6.0 - 9.0 s.u. | LAG480000, Schedule B |

Treatment: sewage treatment plant (aeration, chlorination)

Monitoring Frequency: quarterly at the point of discharge from the oil/water separator located on the northwest side of the facility

Limits Justification: LAG480000, Schedule B and the existing permit.

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

303(d)/TMDL Status

Subsegment 120601 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

The SIC code for this facility are 1389. Stormwater from this site is defined under state regulations (LAC33:IX.2511.B.14) as stormwater associated with industrial activity. SWP3 language is included in the permit since there is a potential for storm water contamination from equipment storage outside.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential

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sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility.